

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

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Investigation by the Department of Telecommunications	)	
and Energy on its own motion pursuant to G.L. c. 159,	)	
§§ 12 and 16, into Verizon New England Inc., d/b/a	)	<b>D.T.E. 01-34</b>
Verizon Massachusetts' provision of Special Access	)	
Services.	)	
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**VERIZON MASSACHUSETTS'  
SECOND SET OF INFORMATION REQUESTS TO  
AT&T COMMUNICATIONS OF NEW ENGLAND, INC.**

Verizon New England Telephone Inc. d/b/a Verizon Massachusetts ("Verizon MA") requests that AT&T Communications of New England, Inc. ("AT&T" or "Respondent") respond to the following information requests addressed to it or its witnesses. In the event responses to all or part of these requests will not be forthcoming in the time period established for this proceeding by the Department of Telecommunications and Energy ("Department"), kindly notify Verizon MA as soon as possible.

These requests shall be deemed continuing so as to require further and supplemental responses if AT&T or its witnesses receive or generate additional information within the scope of these requests between the time of the original responses and the end of hearings in this proceeding.

All responses should conform to the specifications as given in the Definitions and Instructions, with respect to dates, documents, claims or privileges, etc.

If AT&T feels that any request is ambiguous, please notify Verizon MA so that the request may be clarified prior to the preparation of a written response.

**DEFINITION AND INSTRUCTIONS**

1. With respect to each question, please state: (1) the name(s) and title(s) of the person or persons responsible for preparing the response; (2) the name(s) and title(s) of the person or persons who would be competent to testify concerning the response, whether or not that person will be called as part of the party's direct case in this proceeding.

2. In these Information Requests, “AT&T” means AT&T and its respective parents, subsidiaries, affiliates, agents, servants, attorneys, investigators, employees, ex-employees, consultants, representatives and others who are in possession of, or who may have obtained information for or on behalf of any of the above mentioned persons or entities.

3. “Verizon” means Verizon New England, Inc. d/b/a Verizon Massachusetts.

4. The terms “document” and “documentation” are used in the broadest sense to mean all writings and records of every type, including without limitation, written, printed, typed or visually reproduced material of any kind, the original and all copies of any and all letters, reports, memoranda, files, communications, correspondence, agreements, bills, receipts, studies, analyses, telegrams, telexes, minutes, bulletins, instructions, literature, memoranda of conversations, notes, notebooks, diaries, data sheets, financial statements, work sheets, workpapers, pamphlets, plans, specifications, summaries, recordings, tapes, drawings, graphs, indexes, charts, telephone records, photographs, photographic records, computer files, whether or not such files are presently in a hard copy form, other data compilation, or any other written recorded, transcribed, punched, taped, filed or other graphic matter including any draft of the foregoing items and any copy or reproduction of any of the foregoing items upon which any notation, work figure, or form is recorded or has been made which does not appear on the original or as to whose existence, either past or present, the responding party has any knowledge of information. “Document” and “documentation” shall also mean copies of documents, notwithstanding that the originals thereof are not in the Respondent’s possession, custody or control, and all attachments to any document. In the event that documents containing the exact information requested do not exist, but documents do exist that contain portions thereof or which contain substantially similar information, then the definition of “documents” which are to be identified shall include the documents that do exist

6. If AT&T cannot answer a request in full, please answer to the extent possible and state why the request cannot be fully answered.

7. If the AT&T refuses to respond to any request by reason of a claim of privilege, please state the privilege claimed and the facts relied upon to support the claim of privilege.

8. Please serve a copy of the responses to these requests on Verizon MA’s attorney, Barbara Anne Sousa, 185 Franklin Street, Room 1403, Boston, Massachusetts 02110-1585, and Verizon’s Legal Specialist, Barbara Landry, 125 High Street, 11<sup>th</sup> Floor, Boston, Massachusetts 02110. Please make every effort to expedite delivery of responses to these requests, including email, shipping by Express Mail, UPS, Federal Express, Purolator Courier, or means of equal or greater speed.

## **INFORMATION REQUESTS**

- 2-1 On page 4 of the Direct Testimony of Eileen Halloran, it states that “in the overwhelming majority of situations Verizon is the *only* source for these [special access] facilities. Please explain fully the basis for your statement, as it relates specifically to Massachusetts. Also please provide all documents and identify all specific facts upon which you relied in support of your statement for Massachusetts.
- 2-2 On page 4 of the Direct Testimony of Eileen Halloran, it states that “[s]pecial access services from other sources (competitive access providers or other CLECs) are only available in limited circumstances.” Please explain fully the basis for your statement, as it relates specifically to Massachusetts. Also please provide all documents and identify all specific facts upon which you relied in support of your statement for Massachusetts.
- 2-3 On page 8 of the Direct Testimony of Eileen Halloran, it states that “[t]he disparity between Verizon ‘s provisioning and maintenance to its retail customers and to its wholesale customers is repeated and systematic.” Please explain fully the basis for your statement, as it relates specifically to Massachusetts. Also please provide all documents and identify all specific facts upon which you relied in support of your statement for Massachusetts.
- 2-4 On page 10 of the Direct Testimony of Eileen Halloran, it states that “[t]he experiences of AT&T customers per the feedback from AT&T salespeople confirm these percentages.” Please identify the particular percentages to which you refer and explain fully the basis for your statement, as it relates specifically to Massachusetts. Also please provide all documents and identify all specific facts upon which you relied in support of your statement for Massachusetts.

- 2-5 Referring to page 13 of the Direct Testimony of Eileen Halloran, please identify the states included in “Verizon North,” as it relates to AT&T’s experience with “special access DS1 on-time provisioning performance for AT&T in Verizon North.” Please explain fully the basis for your statement that Verizon North’s performance is “worse than the performance for AT&T for any other ILEC.” Also please provide all documents and identify all specific facts upon which you relied in support of your statement, as it relates to Verizon North and as it relates to Massachusetts individually.

Respectfully submitted,

VERIZON MASSACHUSETTS

By its attorney,

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Barbara Anne Sousa  
185 Franklin Street, Room 1403  
Boston, Massachusetts 02110-1585  
(617) 743-7331

Dated: February 15, 2002